

1 STEPHEN J. ERIGERO (SBN 11562)  
2 TIMOTHY J. LEPORE (SBN 13908)  
3 LAEL D. ANDARA (California SBN 215416)  
4 MARIE E. SOBIESKI (California SBN 278008)  
5 ROPERS, MAJESKI, KOHN & BENTLEY  
6 3753 Howard Hughes Pkwy., Suite 200  
7 Las Vegas, NV 89169  
8 Telephone: (702) 954-8300  
9 Facsimile: (650) 780-1701  
10 Email: stephen.erigero@rmkb.com  
11 timothy.lepore@rmkb.com  
12 lael.andara@rmkb.com  
13 marie.sobieski@rmkb.com

14 Attorneys for Plaintiffs  
15 EQUALIA, LLC and HOVERBOARD  
16 TECHNOLOGIES CORPORATION

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 EQUALIA, LLC, a California limited  
20 liability company, and HOVERBOARD  
21 TECHNOLOGIES CORPORATION, a  
22 California corporation,

23 Plaintiffs,

24 v.

25 KUSHGO LLC dba HALO BOARD, a  
26 California limited liability company;  
27 HALO BOARD LLC, an Oregon limited  
28 liability company; ARTHUR  
ANDREASYAN, an individual; and  
SHENZHEN WINGGOO INTELLIGENT  
TECHNOLOGY CO. LTD., a foreign  
company,

Defendants.

CASE NO. 2:16-cv-02851-RFB-CWH

**[PROPOSED] ORDER FOR STIPULATED  
PERMANENT INJUNCTION**

1           WHEREAS, on December 9, 2016, Plaintiffs Equalia LLC and Hoverboard Technologies  
2 Corporation (collectively, "Equalia"), filed a civil action seeking relief for patent infringement  
3 under 35 U.S.C. §271, and unfair and deceptive trade practices under 15 U.S.C. §45, entitled  
4 *Equalia LLC et al. v. Kushgo LLC, et al.*, in the United States District Court, District of Nevada,  
5 Case No. 2:16-cv-2851-RFB (the "Nevada Litigation") against Defendants Kushgo LLC, Halo  
6 Board LLC, and Arthur Andreasyan (collectively, "Defendants");

7           WHEREAS, on February 19, 2017, Defendants filed an appeal with the United States  
8 Court of Appeals for the Federal Circuit, entitled *Equalia LLC et al. v. Kushgo LLC, et al.*, Case  
9 No. 17-1658 (the "Appellate Litigation");

10          WHEREAS, Equalia and Defendants (collectively, "Parties") have reached an agreement  
11 ("Settlement Offer") to resolve the Nevada Action and the Appellate Litigation, and now wish to  
12 stipulate to the entry of a Permanent Injunction;

13          NOW, THEREFORE, the Parties, by and through their counsel, hereby STIPULATE to  
14 the entry of the following Permanent Injunction and request an Order for an injunction pursuant  
15 to 35 U.S.C. §283 and Fed. R. Civ. P. 65, that Defendants Kushgo, LLC, Halo Board, LLC, and  
16 Arthur Andreasyan, as well as their officers, agents, servants, employees, attorneys, and any other  
17 persons in active concert or participation with them are PERMANENTLY ENJOINED from  
18 marketing, displaying, making, using, offering to sell, or selling within the United States, or  
19 importing into the United States, the accused "Halo Board" product(s) and all other products any  
20 substantially similar version thereof, online within the United States or in any physical location  
21 within the United States.

22          ///

23          ///

24          ///

25          ///

26          ///

27          ///

28          ///

1           This permanent injunction is understood to be consistent with the Court's order of January  
2 20, 2017 as entered in Case No. 16-CV-02851. Docket 50.

3  
4           **IT IS SO STIPULATED.**

5           Dated: March 15, 2017

6           ROPERS, MAJESKI, KOHN & BENTLEY

7  
8           By: /s/ Lael D. Andara  
9           LAEL D. ANDARA  
10           MARIE E. SOBIESKI  
11           TIM J. LEPORE  
12           Attorneys for Plaintiff  
13           EQUALIA, LLC and HOVERBOARD  
14           TECHNOLOGIES CORPORATION

15           Dated: March 15, 2017

16  
17  
18           By: /s/ Steven Rinehart  
19           STEVEN RINEHART  
20           Attorney for Defendants  
21           KUSHGO, LLC, HALO BOARD, LLC, and  
22           ARTHUR ANDREASYAN

23           Based on the above stipulation, and for good cause shown,

24           **IT IS SO ORDERED.**

25           Dated: March 15, 2017

26  
27  
28           By:   
29           RICHARD F. BOULWARE, II  
30           United States District Judge  
31           DATED this 22nd day of March, 2017.

## **CERTIFICATE OF SERVICE**

In accordance with Rule 5(b) of the Federal Rules of Civil Procedure, I hereby certify that on the 13th day of March 2017, a copy of **[PROPOSED] ORDER FOR STIPULATED PERMANENT INJUNCTION**, was served on all CM/ECF registered parties by filing and serving the same using the CM/ECF filing system.

/s/ *Lael D. Andara*

Lael D. Andara  
An employee of Ropers Majeski Kohn  
& Bentley, P.C.

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Redwood City